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## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

**Date/Time:** August 11, 2000/ 11:00 a.m.

**Site Contact(s):** Ted A. Hopkins  
**Phone:** 303-966-7652

**Regulatory Contact:** James Hindman  
**Phone:** 303-692-3345

**Agency:** CDPHE

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**Purpose of Contact:** Request for variance from Permit requirement for "empty" tank for RCRA Unit 776.2 (A) and Unit 776.2(B)

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### Discussion

Unit 776.2 Aqueous process waste collection and storage unit.

Tanks: T-1A (Unit 776.2A); T-1B (Unit 776.2B); Tank T-2A (Unit 776.2C) and Tank T-2B (Unit 776.2D)

During a phone conversation with Mr. Hindman, I requested variance from unit specific requirements for overfill prevention requirement for Tanks T-1A (Unit 776.2) and Tank T-1B (Unit 776.2B). The Unit specific operating requirements for these units requires that overfill prevention is met by "bypassing to an empty tank." The requested variance would allow waste to be placed in both tanks provided that the equivalent operating volume of one tank (1200 gallons) is maintained. Operating records showing the transfer in and out of these tanks would be used to verify compliance with this requirement. The only waste stream that flows directly to these tanks is from two decontamination showers. RCTs maintain control of these showers. All other waste must be manually transferred.

Mr. Hindman evaluated this request and approved it with the following stipulation: If changes are made to this system (e.g., change in plumbing, or addition of a high level alarm to replace the "empty tank" as overfill protection), a Permit modification will be submitted to CDPHE within 90 days. Authorization to provide overfill protection to these tanks in the manner described above will terminate on November 9, 2000.

The facility is in the process of repairing an existing high level/low level alarm system for this unit. To check the system, it is necessary to lower the waste water level to below the high-level alarm. It was planned to do this by transferring the waste to B374. But at this time, B374 is not accepting waste. Approval of this request will:

Contact Record 4/10/00  
Rev. 7/13/00

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
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CEX-105-01

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ADMIN RECORD  
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- allow testing of the alarm system; and
- provide storage for other waste waters being generated in the building.

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**Contact Record Prepared By: Ted A. Hopkins**

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**Required Distribution:**

D. Grosek, RFFO  
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C. Burbach, CDPHE  
F. Phillips, K-H  
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M. Johnson, B776  
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